

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

In re:

**Chapter 13
Case No. 16-30780-DHW**

**Keino Coley
Selena Thompson**

Debtors.

**TRUSTEE'S OBJECTION TO DEBTORS'
MOTION TO INCUR DEBT**

COMES NOW, the Trustee, by and through the undersigned, and responds to Debtors' Motion to Approve the Incurring of Debt as follows:

1. On March 25, 2016, Debtors filed the instant, voluntary bankruptcy petition pursuant to Title 13 of the United States Code.
2. This Court entered an order confirming the case on or about July 2, 2016.
3. On August 7, 2017, Debtors filed a Motion to Approve the Incurring of Debt to purchase a vehicle, as Debtors believe they are in need of more reliable transportation.
4. Debtors seek to purchase a 2012 Nissan Sentra for \$12,714.37. Debtors' monthly payments would be \$361.92, at an interest rate of 22.99%.
5. Debtors' plan requires payments of \$260.00 monthly.
6. Schedule J reflects a monthly net income of \$273.81.
7. After plan payments are deducted from Debtors' monthly expenses, there is insufficient income to support an additional monthly expense of the amount Debtors propose.

WHEREFORE, the Trustee respectfully requests that this Honorable Court sustain the Trustee's Objection and deny Debtors' Motion to Approve the Incurring of Debt, as their schedules reflect an inability to afford such an additional monthly expense.

Respectfully submitted, this 28th day of August, 2017.

Sabrina L. McKinney
Standing Chapter 13 Trustee

By: /s/ Tina J. Hayes
Staff Attorney (HAY049)
ASB-9847-C32H

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CERTIFICATE OF SERVICE

I, Tina J. Hayes, certify that a copy of the foregoing TRUSTEE'S OBJECTION TO DEBTOR'S MOTION TO INCUR DEBT has been served on the parties listed below by placing same in the United States Mail, postage prepaid and properly addressed, or via email, this 28th day of August, 2017.

/s/ Tina J. Hayes
Tina J. Hayes

Keino Coley
847 Lower Dublin Road
Ramer, AL 36069

Selena Thompson
847 Lower Dublin Road
Ramer, AL 36069

Richard D. Shinbaum (via CM/ECF)